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June 3, 2025

SENT VIA ECF ONLY

Hon. Matthew J. Skahill
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Bruce King v. Camden Iron & Metal, Inc., et al.*
Case No.: 23-4077
Request for Continuance of Status Conference

Dear Judge Skahill,

My office represents the Plaintiff in the above-referenced matter. Kindly accept this letter in lieu of a more formal motion in compliance with Your Honor's Policies and Procedures. I write to request a continuance of the Status Conference currently scheduled for June 9, 2025 at 10:00am.

By way of background, on March 4, 2025, Your Honor entered a Text Order scheduling a conference in consideration of the pending Motion for Summary Judgment. Since that time, Defendants filed their reply brief in connection with their Motion for Summary Judgment and the parties have conferred about the possibility of Alternative Dispute Resolution (ADR). The parties have determined that ADR would not be productive and have no additional updates at this time.

Further, the undersigned counsel is attached for depositions in another matter pending in the Eastern District of Pennsylvania from June 9 to June 11. Counsel can be available on the afternoon of June 12, the week of June 16, or another date subject to Your Honor's discretion. Defendants consent to this request for a continuance.

Your Honor's time and consideration in this regard is greatly appreciated. If Your Honor has any questions or concerns, please do not hesitate to contact my office.

Respectfully Submitted,

KARPF, KARPF & CERUTTI, P.C.

/s/ **Benjamin D. Salvina**
Benjamin D. Salvina, Esq.

cc: All counsel of record (*via ECF only*)